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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

EXXON MOBIL CORPORATION,

Petitioner/Plaintiff,

v.

SANTA BARBARA COUNTY
BOARD OF SUPERVISORS,

Respondent/Defendant,

and

ENVIRONMENTAL DEFENSE
CENTER, GET OIL OUT!, SANTA
BARBARA COUNTY ACTION
NETWORK, SIERRA CLUB,
SURFRIDER FOUNDATION,
CENTER FOR BIOLOGICAL
DIVERSITY, and WISHTOYO
FOUNDATION,

Proposed Defendant-
Intervenors.

Case No. 2:22-cv-03225(DMG MRWx)

**DECLARATION OF LYNN
CARLISLE IN SUPPORT OF
MOTION TO INTERVENE**

Hon. Dolly Gee

Hearing: October 21, 2022

Time: 9:30 a.m.

Place: Courtroom 8C,
350 West 1st Street, Los Angeles

1 I, Lynn Carlisle, declare as follows:

2 1. I am over 18 years old. I have personal knowledge of the following
3 facts and if called as a witness, would testify to these facts under oath.

4 2. I currently live in Santa Barbara County and have for twelve years.

5 3. I have been a member of Environmental Defense Center for
6 approximately six years.

7 4. I have worked in the Cuyama Valley for the past twelve years. I
8 currently serve as the Executive Director of the Cuyama Valley Family Resource
9 Center ("CVFRC").

10 5. Over the past twelve years, I have driven Route 166 along the
11 trucking route proposed in the ExxonMobil plan hundreds of times and have
12 personally experienced safety issues and unsafe driving practices by other drivers
13 caused by truck traffic. In addition, in my work as Executive Director of the
14 CVFRC in community organizing, advocacy and direct service, I have spoken to
15 more than 100 community members who have recounted their experiences of
16 safety issues and unsafe driving practices by other drivers caused by truck traffic.
17 In addition to increased risk of roadway accidents that will result from the
18 implementation of the trucking proposal, I am very concerned that the proposal
19 will increase the risk of oil spills on the 50-mile stretch of road between Santa
20 Maria and the Cuyama Valley, where the highway crosses the Cuyama River
21 multiple times, in some places within 20-30 feet of the river. I personally
22 witnessed the extensive clean-up operations required to mitigate the March 2020
23 oil spill from a single vehicle crash involving an oil truck that spilled 4,200
24 gallons of oil into the Cuyama River. Further, I am concerned about increased
25 truck traffic along Route 166 as it passes the communities of Cuyama and New
26 Cuyama. I have observed caravans of trucks, including oil trucks, traveling at
27 high rates of speed on Route 166 past the only entrances to our elementary and
28 high school, our residential neighborhoods, our library, our Recreation District

1 facility, our only park, our health clinic, several businesses, and a popular church.
2 For those who live in Cuyama and New Cuyama, Route 166 is the only option for
3 taking children to school, attending medical appointments, shopping for
4 essentials, attending gatherings, in short, getting from one place to another. I have
5 also witnessed unsafe driving practices at the intersection of Route 166 and Route
6 133, which does not include a left-hand turn lane from Route 166 onto Route 133.

7 6. I regularly travel along Route 166 and Highway 101, and from my
8 personal experience driving on these roads, I do not think they can support the
9 additional traffic of large oil tankers traveling on them every day. Not only do the
10 trucks themselves create driving hazards on very windy roads, drivers of other
11 vehicles on the road, often frustrated by long lines of trucks, pass unsafely,
12 crossing double-yellow lines and putting themselves and others at risk. The
13 stretch of road between Santa Maria and the Cuyama Valley is so windy that
14 there are very few passing lanes, no paved pullouts (trucks are not permitted to
15 pull over into gravel pullouts), and poor cell reception for a majority of the route.
16 Further, the California Highway Patrol only provides coverage of the roadway
17 sporadically, hence unsafe driving practices continue largely unchecked.
18 Moreover, Route 166 passes through rugged, mountainous terrain. If an accident
19 involving an oil truck were to cause a fire along the 50-mile isolated route
20 between Santa Maria and the Cuyama Valley, first responders would have
21 significant difficulty accessing and containing a blaze, particularly in our
22 worsening drought conditions. If this project were allowed to proceed, I would
23 worry about my safety, the safety of others, and the safety of the natural
24 environment.

25 7. I am so concerned about the dangers of trucking on this route to me
26 personally and to surrounding communities that I have worked hard in my role
27 with the Cuyama Valley Family Resource Center, to oppose the project. These
28 actions have included: conducting a community-wide campaign that collected

1 300+ signatures—out of a total population of 1,200-1,800 residents—asking that
2 the project be stopped (2019); educating the community about the proposal and
3 potential safety impacts for Cuyama Valley residents at multiple meetings of the
4 Cuyama Valley Community Association (2019-2022); submitting public
5 comment to the Planning and Development Department regarding the SEIR for
6 the trucking proposal (2019, 2021); educating the Cuyama Joint Unified School
7 District (CJUSD) about the issue, obtaining and submitting a Resolution from the
8 CJUSD Board opposing the project (2021); attending Planning Commission
9 hearings and providing oral public comment (2021); meeting (by phone) with 2nd
10 District Planning Commissioner Laura Bridley along with two other Cuyama
11 Valley community members, expressing our concerns about the project (2021);
12 meeting with Darcel Eliot, Chief of Staff for 1st District Supervisor Das Williams
13 to express the community's concerns about the project (2019-2021); educating
14 community members on how to provide public comment to the Planning
15 Commission and the Board of Supervisors on this issue (2021).

16 8. My interests are specifically threatened because the proposed oil
17 trucking would lead to increased accidents along the proposed truck route,
18 increase the risk of oil spills, increase the likelihood of wildfire, and increase
19 potential harm to wildlife, native ecosystems and the Cuyama River. A court
20 order upholding Santa Barbara County's decision will significantly protect me
21 personally, along with other Cuyama Valley residents, including our school
22 children, from increased risk of harm. If the decision is not upheld, drivers and
23 ecosystems will be put at considerable risk from traffic accidents and oil spills,
24 which would decrease my own use and enjoyment of the area.

25 I declare under penalty of perjury that the foregoing is true and correct to
26 the best of my knowledge, information, and belief.
27
28

1 Executed at Santa Barbara, California, on August 23, 2022.

2 

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4 _____
Lynn Carlisle